

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

UNITED STATES OF AMERICA,

v.

CHARLES O'NEIL,

Defendant.

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**Case No. 1:20-cr-00010-LO-1
The Honorable Liam O'Grady
Sentencing Hearing: July 21, 2020**

**DEFENDANT CHARLES O'NEIL'S MOTION TO WITHDRAW
HIS MEMORANDUM IN AID OF SENTENCING FILED AT ECF 19
AND INCORPORATED MEMORANDUM OF POINTS AND AUTHORITIES**

Defendant Charles O'Neil, by and through his undersigned counsel, hereby respectfully moves to withdraw his Memorandum in Aid of Sentencing, filed at ECF 19. The Memorandum in Aid of Sentencing filed at ECF 19 contains certain redactions. Mr. O'Neil intended to file a motion for leave to file an unredacted Memorandum in Aid of Sentencing under seal, but after speaking with the Clerk's Office, it is now clear that we will not be able to meet the logistical requirements to do so by the filing deadline.

Wherefore, for the foregoing reasons, Mr. O'Neil respectfully moves to withdraw his Memorandum in Aid of Sentencing, filed at ECF 19. Mr. O'Neil will file an unredacted Memorandum in Aid of Sentencing within the filing deadline.

Respectfully submitted,

/s/ Steven J. McCool, Esq.

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Counsel for Charles O'Neil

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2020, the foregoing was served upon counsel of record by CM/ECF electronic filing.

/s/ Steven J. McCool
STEVEN J. McCOOL